

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

SHANNON PEREZ; HAROLD DUTTON, JR. )  
GREGORY TAMEZ; SERGIO SALINAS; )  
CARMEN RODRIGUEZ; RUDOLFO ORTIZ; )  
NANCY HALL and DOROTHY DEBOSE )  
 )  
Plaintiffs )  
-and- )  
 )  
EDDIE BERNICE JOHNSON; SHEILA )  
JACKSON-LEE and ALEXANDER GREEN; )  
MEMBERS OF THE UNITED STATES )  
CONGRESS )  
 ) CIVIL ACTION NO.  
-and- ) 11-CA-360-OLG-JES-XR  
 ) [Lead case]  
TEXAS LEGISLATIVE BLACK CAUCUS, )  
TEXAS HOUSE OF REPRESENTATIVES )  
 )  
-and- )  
 )  
TEXAS STATE CONFERENCE OF NAACP )  
BRANCHES; HOWARD JEFFERSON, )  
JUANITA WALLACE and REV. BILL LAWSON )  
 )  
Plaintiff-Intervenors )  
 )  
v. )  
 )  
STATE OF TEXAS; RICK PERRY, in his official )  
capacity as Governor of the State of Texas; )  
DAVID DEWHURST, in his official capacity as )  
Lieutenant Governor of the State of Texas; )  
JOE STRAUS, in his official capacity as Speaker )  
of the Texas House of Representatives; )  
HOPE ANDRADE, in her official capacity as )  
of  
Secretary of State of the State of Texas )  
 )  
Defendants )

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MEXICAN AMERICAN LEGISLATIVE )  
CAUCUS, TEXAS HOUSE OF )  
REPRESENTATIVES (MALC) )  
 )  
 Plaintiffs )  
 )  
 -and- )  
 )  
 THE HONORABLE HENRY CUELLAR, )  
 Member of Congress, CD 28; THE TEXAS )  
 DEMOCRATIC PARTY and BOYD RICHIE, )  
 in his official capacity as Chair of the Texas )  
 Democratic Party; and LEAGUE OF UNITED )  
 LATIN AMERICAN CITIZENS (LULAC) )  
 and its individually named members )  
 )  
 Plaintiff-Intervenors )  
 )  
 v. )  
 )  
 STATE OF TEXAS; RICK PERRY, in his )  
 official capacity as Governor of the State of )  
 Texas; DAVID DEWHURST, in his official )  
 capacity as Lieutenant Governor of the State )  
 of Texas; JOE STRAUS, in his official capacity )  
 as Speaker of the Texas House of Representatives )  
 )  
 Defendants )  
 )  
 CIVIL ACTION NO.  
 SA-11-361-OLG-JES-XR  
 [Consolidated case]

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TEXAS LATINO REDISTRICTING TASK )  
FORCE, JOEY CARDENAS, ALEX JIMENEZ, )  
EMELDA MENENDEZ, TOMACITA )  
OLIVARES, JOSE OLIVARES, ALEJANDRO )  
ORTIZ and REBECCA ORITIZ )  
 )  
 Plaintiffs )  
 )  
 v. )  
 )  
 RICK PERRY, in his official capacity as )  
 Governor of the State of Texas )  
 )  
 Defendants )  
 )  
 CIVIL ACTION NO.  
 SA-11-CA-490-OLG-JES-XR  
 [Consolidated case]

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MARGARITA V. QUESADA; ROMEO )  
MUNOZ; MARC VEASEY; JANE )  
HAMILTON; LYMAN KING; JOHN )  
JENKINS, DEBBIE ALLEN, SANDRA )  
PUENTE, JAMAAL SMITH, KATHLEEN )  
MARIA SHAW, )  
 )  
Plaintiffs )  
 )  
v. ) CIVIL ACTION NO.  
 ) SA-11-CA-592-OLG-JES-XR  
 ) [Consolidated case]  
RICK PERRY, in his official capacity as Governor )  
of the State of Texas; and HOPE ANDRADE, )  
in her official capacity as Secretary of the State )  
of the State of Texas )  
 )  
Defendants )

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JOHN T. MORRIS )  
 )  
Plaintiff ) CIVIL ACTION NO.  
 ) SA-11-CA-615-OLG-JES-XR  
v. ) [Consolidated case]  
 )

STATE OF TEXAS; RICK PERRY, in his official )  
capacity as Governor of the State of Texas; DAVID )  
DEWHURST, in his official capacity as Lieutenant )  
Governor of the State of Texas; JOE STRAUS, )  
in his official capacity as Speaker of the Texas )  
House of Representatives; and HOPE ANDRADE, )  
in her official capacity as Secretary of State )  
of the State of Texas )  
 )

Defendants )

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EDDIE RODRIGUEZ, MILTON GERARD )  
WASHINGTON, BRUCE ELFANT, ALEX )  
SERNA, SANDRA SERNA, BETTY F. LOPEZ, )  
DAVID GONZALEZ, BEATRICE SALOMA, )  
LIONOR SOROLA-POHLMAN; ELIZA )  
ALVARADO; JUANITA VALDEZ-COX; )  
JOSEY MARTINEZ; NINA JO BAKER; )  
TRAVIS COUNTY and CITY OF AUSTIN )  
 )

Plaintiffs	)	CIVIL ACTION NO.
v.	)	SA-11-CA-635
	)	[Consolidated case]
RICK PERRY, in his official capacity as Governor of the State of Texas; DAVID DEWHURST, in his official capacity as Lieutenant Governor of the State of Texas; JOE STRAUS, in his official capacity as Speaker of the Texas House of Representatives; and HOPE ANDRADE, in her official capacity as Secretary of State of the State of Texas; STATE OF TEXAS; BOYD RICHIE, in his official capacity as Chair of the Texas Democratic Party; and STEVE MUNISTERI, in his official capacity as Chair of the Republican Party of Texas	)	
Defendants	)	

**QUESADA PLAINTIFFS' DESIGNATION OF POTENTIAL WITNESSES,  
TESTIFYING EXPERTS, AND LIST OF PROPOSED EXHIBITS**

Pursuant to this Court's August 1, 2011 Order, the Plaintiffs Margarita Quesada, *et al.*, hereby designate their potential witnesses, testifying experts, and list of proposed exhibits. Since discovery is ongoing, the Quesada plaintiffs reserve the right to supplement the listing of witnesses and exhibits.

**POTENTIAL WITNESSES**

1. Plaintiff Marc Veasey, 8224 Longfellow Lane, Fort Worth, TX 76120
2. Dr. Allan J. Lichtman, Professor, American University, Washington, DC
3. Dr. Michael McDonald, Professor, George Mason University, Fairfax, VA
4. State Senator Rodney Ellis, inadequacy of the redistricting process in TX Legislature
5. State Senator Royce West, inadequacy of the redistricting process in TX Legislature and alternative plans offered in Legislature
6. State Rep. Richard Raymond, impact of plans on Latino voters and inadequacy of the redistricting process in TX Legislature
7. State Senator Mario Gallegos, impact of plans on Latino voters and inadequacy of the redistricting process in TX Legislature

8. Representative Burt R. Solomons, District 65 Texas House of Representatives Redistricting Committee
9. Kel Seliger, Texas Senate Select Committee on Redistricting
10. Doug Davis, Staff Member for Lt. Gov. Dewhurst: drew maps on behalf of the Lieutenant Governor
11. Gerardo Interiano, Counsel to Speaker Strauss who drew redistricting maps and consulted with Republican Congressional members and staff
12. Republican Members of the Texas Congressional Delegation
13. Those persons listed by Plaintiffs Perez *et al.*, MACL; Latino Redistricting Task Force *et al.*, LULAC *et al.*, Cuellar, Rodriguez et al., Morris *et al.*, and all persons listed by all Defendants.

TESTIFYING EXPERTS

The following persons are hereby designated as testifying experts by Plaintiffs Margarita Quesada, *et al.*:

1. Dr. Allan J. Lichtman  
Professor of History  
American University  
Washington DC
2. Dr. Michael McDonald  
Associate Professor of Government and Politics  
George Mason University  
Fairfax, VA  
and  
Senior Fellow at the Brookings Institution  
Washington, DC  
This 8th day of August, 2011.

The reports from these testifying excerpts are being filed and served with this designation.

LIST OF PROPOSED EXHIBITS

Ex.

No. Description of Exhibit

- 1 Expert Witness Report of Dr. Allan J. Lichtman
- 2 Expert Witness report of Dr. Michael McDonald
- 3 TX Senate - Hearing Excerpts Regarding Congressional Redistricting  
June 3, 2011  
[Jun 03 - Senate Select Committee on Redistricting \(Part I\)](http://www.senate.state.tx.us/avarchive/ramav.php?ram=00005467)  
[Jun 03 - Senate Select Committee on Redistricting \(Part II\)](http://www.senate.state.tx.us/avarchive/ramav.php?ram=00005468)  
<http://www.senate.state.tx.us/avarchive/ramav.php?ram=00005468>
- 4 TX Senate - Hearing Excerpts Regarding Congressional Redistricting -  
June 6 2011  
<http://www.senate.state.tx.us/avarchive/ramav.php?ram=00005472>
- 5 Links to full Congressional Redistricting Hearings and Floor discussion  
for Texas House and Texas Senate
- 6 Congressional Redistricting Timeline
- 7 Rodney Ellis Letter to DOJ, dated July 5, 2011
- 8 NAACP - 111 Congress Score
- 9 NHLA - 108th Congress
- 10 Congressional Maps Sail Out Of House Redistricting On Party Line Vote  
(Quorum Report, June 9, 2011)
- 11 Hispanic Redistricting Task Force Says Three of the New Congressional  
Districts Should Be Hispanic-Opportunity  
(Quorum Report, April 7, 2011)
- 12 HK- Is It Appropriate For House Redistricting To Meet Out Of Cameras  
Sight (Quorum Report, April 18, 2011)
- 13 House Redistricting Committee Hears From Unhappy Constituencies  
(Quorum Report, April 15, 2011)
- 14 King Seeks To Bypass Obama DOJ with Texas Redistricting Plans  
(Quorum Report, April 7, 2011)
- 15 Seliger Challenged On Source for His Map (Quorum Report, June 3, 2011)
- 16 Seliger- No Senator Has Yet Asked For a Congressional District (Quorum  
Report, May 4, 2011)
- 17 The Eyes of Texas Could Be Upon Next House (Quorum Report, June 7,  
2011)

18 Veasey Proposes Congressional Map Creating Three New Minority Opportunity Districts(Quorum Report, May 26, 2011)

19 2011 Proposed Congressional Districts - CD 6

20 2011 Proposed Congressional Districts - CD 9

21 2011 Proposed Congressional Districts - CD 9 - AA Shading Map

22 2011 Proposed Congressional Districts - CD 9 - Black + Hisp Shading Map

23 2011 Proposed Congressional Districts - CD 9 - Hisp Shading Map

24 2011 Proposed Congressional Districts - CD 12

25 2011 Proposed Congressional Districts - CD 12 - Black Shading Map

26 2011 Proposed Congressional Districts - CD 12 - Black + Hisp Shading Map

27 2011 Proposed Congressional Districts - CD 12 - Hisp Shading Map

28 2011 Proposed Congressional Districts - CD 18

29 2011 Proposed Congressional Districts - CD 18 - AA Shading Map

30 2011 Proposed Congressional Districts - CD 18 - Black + Hisp Shading Map

31 2011 Proposed Congressional Districts - CD 18 - Hisp Shading Map

32 2011 Proposed Congressional Districts - CD 26

33 2011 Proposed Congressional Districts - CD 26 - Black Shading Map

34 2011 Proposed Congressional Districts - CD 26 - Black + Hisp Shading Map

35 2011 Proposed Congressional Districts - CD 26 - Hisp Shading Map

36 2011 Proposed Congressional Districts - CD 29

37 2011 Proposed Congressional Districts - CD 29 - Black + Hisp Shading Map

38 2011 Proposed Congressional Districts - CD 29 - Black Shading Map

39 2011 Proposed Congressional Districts - CD 29 - Hisp Shading Map

40 2011 Proposed Congressional Districts - CD 30

41 2011 Proposed Congressional Districts - CD 30 - AA + Hisp Shading Map

42 2011 Proposed Congressional Districts - CD 30 - AA Shading Map

43 2011 Proposed Congressional Districts - CD 30 - Hisp Shading Map

44 2011 Proposed Congressional Districts - CD 33

45 2011 Proposed Congressional Districts - CD 33 - Black + Hisp Shading Map

46 2011 Proposed Congressional Districts - CD 33 - Black Shading Map

47 2011 Proposed Congressional Districts - CD 33 - Hisp Shading Map

48 2011 Proposed Congressional Districts - CD 23

- 49 2011 Proposed Congressional Districts - CD 23 - Black Shading Map
- 50 2011 Proposed Congressional Districts - CD 23 - Hisp Shading Map
- 51 2011 Proposed Congressional Districts - CD 23 – Bexar County - Black Shading Map
- 52 2011 Proposed Congressional Districts - CD 23 – Bexar County - Hisp Shading Map
- 53 2011 Proposed Congressional Districts - CD 23 – El Paso - Black Shading Map
- 54 2011 Proposed Congressional Districts - CD 23 – El Paso - Hisp Shading Map
- 55 2003 Benchmark Congressional Districts - CD 23
- 56 2003 Benchmark Congressional Districts - CD 23 - Black Shading Map
- 57 2003 Benchmark Congressional Districts - CD 23 - Hisp Shading Map
- 58 2003 Benchmark Congressional Districts - CD 23 – Bexar County - Black Shading Map
- 59 2003 Benchmark Congressional Districts - CD 23 – Bexar County - Hisp Shading Map
- 60 2003 Benchmark Congressional Districts - CD 23 – El Paso - Black Shading Map
- 61 2003 Benchmark Congressional Districts - CD 23 – El Paso - Hisp Shading Map
- 62 The GOP's big Texas gerrymander (Washington Post, June 2, 2011)
- 63 Bad plan (Houston Chronicle, June 7, 2011)
- 64 GOP redistrict map hijacks Latino voters – by State Senator Carlos Uresti (Corpus Christi, Friday, June 10, 2011)
- 65 Editorial: Legislature's new congressional maps still fail voters (Dallas Morning News, June 14, 2011).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of August, 2011, I served a copy of the foregoing Motion for A Stay of Proceedings And to Postpone Trial on counsel who are registered to receive NEFs through the CM/ECF system. All attorneys who have not yet registered to receive NEFs have been served via first-class mail, postage prepaid and addressed as follows:

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/s/ J. Gerald Hebert  
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